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Subject: LCP Monthly Progress Report, April 2013
Date: Tuesday, May 07, 2013 6:04:26 AM
Attachments: [L050613JG\(0413\)ProgRep.pdf](#)

Good morning Jon.

On behalf of IES, attached is the monthly progress report for the LCP Chemicals, Inc. Superfund site. Paper copies will be sent via US Mail.

Please contact either John Hoffman of Ashland Inc. or me, should you have questions or comments.

Thank you



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VIA E-MAIL AND US MAIL

May 6, 2013

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: Monthly Progress Report for April 2013
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Continued preparation of a revised final *Remedial Investigation Report* (RIR), based on final input from the USEPA on the response to the Agency's comments. A redline version of the RIR is being prepared for Agency review to facilitate the final review process.
- Completed a redline version of the *Draft-Final Baseline Ecological Risk Assessment* (Appendix Q to the RIR), based on final comments received from the Agency in a letter dated January 16, 2013.

- Completed a preliminary, draft response to comments from the USEPA on the *Draft Feasibility Study* (FS) report, as provided by the Agency in a letter dated February 11, 2013, and provided this preliminary draft to the Agency to help facilitate the review process.
- Representatives of Ashland and EHS-Support met with the USEPA Project Manager, on April 9, 2013, to discuss project status.
- Representatives of Ashland and Ashland's outside counsel met with the USEPA on April 24, 2013, to discuss project status and other possible PRPs.
- Completed the site/building air monitoring, and preparation of the monitoring report is pending.

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated April 4, 2013, including an updated project schedule dated April 1, 2013.
- Preliminary, draft response to USEPA comments on the FS, submitted via electronic mail on April 3, 2013, from Gary DiPippo of Cornerstone Environmental Group to Jonathan Gorin of the USEPA.
- A redline version of the *Draft-Final Baseline Ecological Risk Assessment*, submitted on CD via letter dated April 23, 2013, from Meghan Schuck and J. Keith Tolson of Geosyntec to Jonathan Gorin of the USEPA.

C. The following agency approvals were received during the previous month:

- None during the reporting period.

D. The following agency documents and correspondences were received during the previous month:

- None during the reporting period.

E. Other pertinent communications with the agencies during the previous month:

- Letter from John Hoffman of Ashland to Jonathan Gorin of the USEPA, dated April 22, 2013, regarding peer review by the National Remedy Review Board.

2. Future Actions, Data, and Plans

- A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months contingent on the USEPA's final approval of the revised RIR and BERA reports and responses to comments on the draft FS report:

- Submit a redline version of the final *Remedial Investigation Report* for USEPA review and following Agency review prepare the final RIR report for submittal to the USEPA.
- Prepare the final *Baseline Ecological Risk Assessment* for submittal to the USEPA, following the USEPA's review of the redline version submitted on April 23, 2013.
- Prepare the final FS report for submittal to the USEPA, including a response to comments summary, following the USEPA's review of the preliminary draft response to comments submitted on April 3, 2013.
- Continue work to properly dispose of the tank that moved during Hurricane Sandy.

B. Other information related to the progress of work:

- None during this reporting period.

3. Project Schedule

- A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. With the submittal to the USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process. Coordination with the USEPA is ongoing regarding the review process. Based on the current status of coordination with the USEPA on the RI, BERA, and FS, the schedule remains unchanged for completion of the RI and BERA, and one month has been added to the schedule for completion of the FS. Based on this updated schedule, the RI and BERA are projected to be finalized on or about June 21, 2013, and the FS is projected to be finalized on or about July 29, 2013. As the time necessary to complete the review process and prepare final RI and FS documents is further defined, the schedule will be updated accordingly.
- B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:
- No specific delays are being encountered at this time, and the current schedule reflects the continuation of coordination with the USEPA to finalize the draft RI and FS reports.
- C. Description of efforts made to mitigate these delays or anticipated delays:
- None necessary at this time.

4. Funding Mechanism

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3233.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC



Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.	C. McGowan, EHS Support
S. Miller, NJDHSS	S. MacMillin, Brown and Caldwell
F. Cardiello, Esq., USEPA	K. Tolson, Geosyntec
D. Toft, Esq.	M. DeFlaun, Geosyntec
A. Pavelka, NJDEP	J. Kubitz, Entrix
R. Lampkin, Ashland	

Figure 1
RI/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site

